

EXHIBIT II

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
THIRD SET OF INTERROGATORIES**

Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill") submit these responses to Plaintiff's Third Set of Interrogatories.

OBJECTIONS TO DEFINITIONS

1. Defendants object to the definition of Castle Hill to the extent it seeks to impose obligations on Defendants beyond those required by the Federal Rules of Civil Procedure. Defendants specifically object to the inclusion of current and former personnel in that definition, because information from former personnel is not within Castle Hill's possession, custody or control. Defendants object to the definition of Castle Hill as to include agents, representatives and consultants, because these terms are not defined and are imprecise, because they fail to sufficiently identify those persons who allegedly fall within the scope of the definition, and because information that may be in the possession of such persons is not necessarily within Castle Hill's possession, custody or control. Defendants object to the definition of Castle Hill as to include attorneys, to the extent information in the possession of its current and former attorneys is protected from disclosure by the attorney client privilege and work-product doctrine.

INTERROGATORY NO. 16: Identify all of CHG's Investors, and for each Investor, identify the amount invested in CHG, the timing of the investment(s), the percent ownership of the investor in CHG, and whether the Investor holds or has held any board or advisory position at CHG.

RESPONSE: CHG objects to this request as overly broad and as seeking information that is not relevant to the claims or defenses of the parties in this case. The identity of individuals who have invested capital into CHG, together with the additional information sought in this request, is wholly irrelevant to the issues between the parties. CHG further objects to this request as seeking confidential and proprietary information regarding relationships with investors.

INTERROGATORY NO. 17: Describe all information, Documents, and Things You have ever had in Your possession, custody, or control that (a) any Former VGT Employee brought from VGT to CHG, (b) were created by or at VGT, or (c) are the property of VGT.

RESPONSE: CHG objects to this interrogatory as duplicative of Interrogatory No. 13, and to the extent it seeks information regarding individuals or entities other than the named defendants in this case. Without waiver of these objections, CHG states that it is unaware of any documents in its possession, custody or control it has ever had that are responsive to this request.

INTERROGATORY NO. 18: Describe each Communication that CHG has made or sent to a third party regarding VGT, the VGT Marks, the VGT Trade Dress, the VGT Trade Secrets, or VGT's products.

RESPONSE: Castle Hill objects to this Interrogatory as overly broad, unduly burdensome and vague, since it is not limited to the claims and defenses of the parties. CHG further objects to this request as vague, ambiguous, and confusing, to the extent it uses the terms "VGT Marks, the VGT Trade Dress, the VGT Trade Secrets or VGT's products" which are not defined terms and have not been described or identified by VGT throughout discovery with specificity and particularity. CHG further objects to this request as seeking information that is not